

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DISTRICT**

AIRICA STEED, ED.D.)	CASE NO. 1:25-CV-00443-PAB
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
v.)	<u>DEFENDANTS' MOTION FOR</u>
)	<u>LEAVE TO FILE OVERSIZED</u>
METROHEALTH SYSTEM, ET AL.,)	<u>BRIEF</u>
)	
Defendants.)	
)	
)	

Pursuant to Local Rule 7.1(f) Defendants the MetroHealth System (“MetroHealth”), John Moss (“Moss”), Tamiyka Rose (“Rose”), E. Harry Walker (“Walker”), Laura McBride (“McBride”), Sonja Rajki (“Rajki”), Sarah Partington (“Partington”) and Robin Barre (“Barre”) (collectively, “Defendants”) by and through counsel, hereby request leave to file Defendants’ Rule 12(b)(6) partial Motion to Dismiss in excess of the page numbers permitted by the Local Rules. Defendants request an additional ten (10) pages over the twenty (20) page limit.

In support of this Motion, Defendants state:

1. Plaintiff filed her Amended Complaint on April 7, 2025. (ECF No. 7.)
2. The Court granted the parties’ stipulated Motion for Extension of Time until May 7, 2025 to answer or otherwise respond to the Amended Complaint. (ECF No. 8.)
3. Plaintiff’s Amended Complaint is a total of sixty (60) pages and 325 numbered paragraphs which include ten (10) counts alleged against Defendants. (ECF No. 7.)
4. Defendants intend to file their Answer and Counterclaims, along with the Motion to Dismiss on May 7, 2025 per paragraph II of Judge Barker’s Standing Order.

5. The Motion will address four (4) of the counts alleged by Plaintiff, including Wrongful Termination in Violation of Public Policy; Defamation; Hostile Work Environment; and Invasion of Privacy.

6. Although the Local Rules establish a 20-page limit for memoranda relating to dispositive motions, Defendants reasonably require an additional ten (10) pages.

7. Defendants request the additional ten (10) pages to set out the relevant facts, law and analysis requiring dismissal of the aforementioned claims.

8. Defendants feel that the additional pages will assist the Court in understanding the facts and law at issue, and ultimately aid the Court in rendering its decision on this Motion.

Wherefore, Defendants respectfully request that leave be granted to permit Defendants to file a thirty (30) page Memorandum of Law in Support of Defendants' Motion to Dismiss.

Dated: May 2, 2025

Respectfully submitted,

/s/ Adrian D. Thompson

Adrian D. Thompson (0036742)

athompson@taftlaw.com

John R. Mitchell (0066759)

jmitchell@taftlaw.com

Philip Williamson (0097174)

pwilliamson@taftlaw.com

Allison McFarland (MA703697)

amcfarland@taftlaw.com

TAFT STETTINIUS & HOLLISTER LLP

200 Public Square, Suite 3500

Cleveland, OH 44114-2302

Phone: (216) 706-3912

Facsimile: (216) 241-3707

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the May 2, 2025, a true and accurate copy of the foregoing was filed electronically via the Court's electronic filing system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/ Adrian D. Thompson

Adrian D. Thompson (0036742)